

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	PS Docket No. 10-255
Framework for Next Generation	)	
911 Deployment	)	

**COMMENTS OF GREATCALL, INC.**

GreatCall, Inc. (GreatCall), the creator of the Jitterbug mobile phone, respectfully submits these comments in response to the Federal Communications Commission’s (FCC or Commission) above referenced *Notice of Inquiry (NOI)* on the Framework for Next Generation 911 (NG911) Deployment.<sup>1</sup> GreatCall applauds the Commission’s leadership in developing this comprehensive proceeding to address the technological innovations and competitive challenges facing our Nation’s 911 systems.

**I. BACKGROUND: GREATCALL, INC.**

GreatCall, Inc.<sup>2</sup>, based in San Diego, California, is the leader in delivering easy-to-use and life-enhancing services to people who seek simplicity. GreatCall offers a full range of wireless-based innovative services that are designed to improve the health, wellness, and safety

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<sup>1</sup> In the Matter of Framework for Next Generation 911 Deployment, PS Docket No. 10-255, *Notice of Inquiry*, FCC 10-200, (released December 21, 2010) (“*NOI*”).

<sup>2</sup> GreatCall, Inc. differentiates itself as a company of “People You Can Count On” to deliver wireless services focused on helping to keep customers connected, safe and healthy. The company stands apart from other wireless service providers through its simplified, personalized and humanized approach, as well as its commitment to providing a high quality customer service experience. The company has been widely praised for its ability to deliver the benefits of innovation and technology in a meaningful and easy-to-use format. GreatCall has received prominent national media accolades from *The Wall Street Journal*, *Business Week*, *The New York Times*, *The Washington Post* and major TV broadcast networks. GreatCall’s services, applications and cell phone handsets are sold nationwide at leading retailers such as Best Buy, Sears, Sears Hometown Stores, Radio Shack Dealer Franchise, Fry’s Electronics and ShopKo, as well as direct to consumers at 1-800-918-8543 and online at GreatCall.com. Service coverage includes the U.S. and Canada.

of its customers through its mobile phone and Internet customer service platform.<sup>3</sup> The company stands apart from other wireless service providers through its simplified, personalized and humanized approach, as well as its commitment to providing a high quality customer service experience. GreatCall provides digital wireless services on a common carrier basis, offering customers affordable mobile wireless phone service at flat rates without fixed-term contracts, credit checks or termination fees.

## **II. GREATCALL’S OPERATOR-ASSISTED SERVICES.**

GreatCall offers unprecedented services that promote delivery of healthcare, safety and wellness services. We are constantly expanding our features to meet the growing needs of our customers.

Upon enrollment, each customer receives a personal, password protected “MyGreatCall” online account. This account enables the customer to, among other things, monitor phone usage, order additional over-the-air features, update his or her phone book, review billing information, or personalize his or her experience by calling a 24-hour operator.

GreatCall has announced the addition of a new service to its portfolio of award-winning services that keep customers connected, safe and healthy - *5Star Personal Security*. *5Star Personal Security* will provide customers with peace of mind and the ability to get real-time professional support when they need help or assistance – at home or on the go. The *5Star Personal Security* service essentially turns their cell phone into a personal security device. When a customer touches (5) and (\*) on their Jitterbug phone, he or she will immediately connect to a specially-trained agent, certified by the National Academies of Emergency Dispatch (NAED), who is available 24 hours a day, 365 days a year. The agent that answers the phone will

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<sup>3</sup> These services include Live Nurse (in partnership with FONEMED®) Jitterbug Wellness Calls, Jitterbug “Check-In” Call service, Jitterbug Medication and Prescription Refill Reminders, and Jitterbug Diabetes Management.

immediately recognize the caller, be able to track the caller's location using patent-pending enhanced location technology, and have access to the customer's personal emergency profile (PEP). The PEP is voluntarily completed by *5Star Personal Security* customers and contains personal information such as the customer's address and phone number, family and medical emergency contacts, important medical information, vehicle information, and other information that may be of assistance in the event the customer has an emergency. The PEP is maintained on GreatCall's secured network.

The agent will assess the situation, contact family members for familial support, dispatch appropriate assistance, or connect to 911 in the event of an emergency while remaining on the line to ensure resolution of the situation. In the event of an emergency, the agent will verbally relay to the Emergency Medical System (EMS) or Public Safety Answering Point (PSAP) any information that is available and needed to assist the customer. The agent can also remain on the call to monitor the situation for as long as needed to aid the customer or place a follow-up call to the as the situation warrants.

GreatCall's *5Star Personal Security* profile database is secured by SAS70 Type II certified systems to ensure privacy of the personal data received from customers. Like all of GreatCall's services, the *5Star Personal Security service* is HIPAA compliant and is not a substitute for 911 emergency services.

## **II. NG911 SHOULD FOSTER THE EXCHANGE OF DATA-CENTRIC INFORMATION TO ALL EMERGENCY SERVICE PROVIDERS.**

In the *Notice of Inquiry*, the Commission acknowledges that “NG911 could permit the simultaneous transmission of critical health data along with a 911 call for help...”<sup>4</sup> In fact, if

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<sup>4</sup> *NOI* at paragraph 29.

provided by the customer, GreatCall's agents can access customer personal and medical information today in the event they need to call 911 for an emergency. However, because of the limited capabilities of some PSAPs, this information is provided to emergency service providers via voice-centric communications methods.

GreatCall expects to deploy new health and wellness services and offer additional features that will enable our customers to store and retrieve more advanced data, including medical reports, charts, and other records that will be impossible to verbally communicate and analyze using today's 911 networks. In order for PSAPs to be able to obtain this data, NG911 will need to address the funding issues that will be necessary to support the build out of PSAP networks to enable them to receive this vital data. In addition, uniform and open standards will need to be developed to ensure that the various PSAP jurisdictions implement non-proprietary systems and applications capable of accessing more data-centric or IP-based data to enable the exchange and management of data with each other and with other emergency service responders. This will in turn expedite and enable GreatCall's customers to receive timely and appropriate emergency medical response assistance.

### **III. NG911 MUST PROVIDE FOR SECURE TRANSMISSION OF PERSONAL EMERGENCY INFORMATION.**

The FCC's National Broadband Plan to Congress<sup>5</sup> recommended that the Commission "explore how public expectations may evolve in terms of the communications platforms the public would rely upon to request emergency services." GreatCall's customers have come to rely on many of our services that promote the safe and secure delivery of their health and wellness

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<sup>5</sup> Federal Communications Commission, *Connecting America: The National Broadband Plan*, Chapter 16 "Public Safety," Section 16.3, "Leveraging Broadband Technologies to Enhance Communications with the Public," at 326 (released March 16, 2010) (National Broadband Plan), available at <http://download.broadband.gov/plan/national-broadband-plan.pdf>; last visited February 20, 2011).

services. Our customers are aware that our services can identify their location, directly connect to an emergency response provider in the event of an emergency, advise emergency responders as to the likelihood of injury, and provide continual communications contact until help arrives.

We expect that our customers will increasingly rely on our network for storage and retention of medical and health records and the safe and secure transmission of that information to other emergency response networks. We stand ready to serve our customers and provide this and other advanced emergency services in the event an incident requires the assistance of an NG911 system.

However, while networks for emergency response and other public safety agencies offer secure treatment of emergency information, NG911 will require the integration of security that far exceeds the capabilities of current legacy 911 networks. As GreatCall noted in its Comments to the Commission in the National Broadband Plan NBP Public Notice #17<sup>6</sup>, in order for our mobile health applications or services to have a real impact on the lives of our customers, there must be a seamless, simple and secure experience across the entire mobile and online network, with automatic syncing between the online and mobile experience. Secure and advanced broadband services will be needed to realize the full potential of these services that have the potential to aid emergency response personnel in saving lives.

## **V. CONCLUSION**

New technologies and services, such as those being offered by GreatCall, Inc., are

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<sup>6</sup> Comments of GreatCall *In the Matters of International Comparison and Survey Requirements in the Broadband Data Improvement Act*, GN Docket No. 09-47; *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Inquiry Concerning the Deployment of Telecommunications Advanced to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act Capability*; GN Docket No. 09-137; *In the Matter of Request of North Carolina Telehealth Network for Extension of Funding Deadline Under the Rural Health Care Pilot Program*, WC Docket No. 02-60 at 7 (Dec. 4, 2009); <http://fjallfoss.fcc.gov/ecfs/document/view?id=7020352151>

enhancing the way people maintain and communicate important medical, safety, and health information that can aid them and assist emergency response personnel in the event of an emergency. Critical funding to upgrade voice-centric networks, the adoption of uniform and open standards, and the integration of security will need to be essential components in the Commission's NG911 framework. These components will further enable our Nation's public safety responders to perform critical lifesaving functions.

Respectfully submitted,

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